

Joshua M. Sasaki, P.C., OSB No. 964182

[josh.sasaki@millernash.com](mailto:josh.sasaki@millernash.com)

MILLER NASH GRAHAM & DUNN LLP

3400 U.S. Bancorp Tower, 111 S.W. Fifth Ave

Portland, OR 97204

Telephone: 503.224.5858

Facsimile: 503.224.0155

Benjamin G. Shatz (pro hac vice)

[bshatz@manatt.com](mailto:bshatz@manatt.com)

Christine M. Reilly (pro hac vice)

[creilly@manatt.com](mailto:creilly@manatt.com)

John W. McGuinness (pro hac vice)

[jmcguinness@manatt.com](mailto:jmcguinness@manatt.com)

MANATT, PHELPS & PHILLIPS, LLP

2049 Century Park East, Suite 1700

Los Angeles, CA 90067

Telephone: 310.312.4000

Facsimile: 310.312.4224

Attorneys for Defendant

ViSalus, Inc.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

LORI WAKEFIELD, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

VISALUS, INC., a Nevada corporation,

Defendant.

No. CV No. 3:15-cv-01857-SI

**DEFENDANT'S UNOPPOSED MOTION  
FOR AN EXTENSION OF TIME TO  
OCTOBER 15 TO FILE OPPOSITIONS TO  
PLAINTIFF'S (1) CLASS NOTICE  
PROPOSAL AND (2) MOTION FOR  
ATTORNEYS' FEES & INCENTIVE  
AWARD**

**LOCAL RULE 7-1 CERTIFICATION**

Counsel for Defendant ViSalus conferred with Counsel for Plaintiff Wakefield, and Plaintiff's counsel consented to the extensions requested here.

**MOTION FOR EXTENSIONS OF TIME**

Currently pending are Plaintiff's motion for attorneys' fees and an incentive award (Dkt. 388; opposition due October 8, 2020) and Plaintiff's motion for approval of post-judgment notice plan and claims procedure (Dkt. 396; opposition due October 9, 2020).

In light of the parties' October 5 mediation session, and to better coordinate the post-judgment proceedings and briefing, ViSalus moves to extend its opposition deadlines to October 15.

On September 29, ViSalus requested that Plaintiff agree to these extensions and Plaintiff's counsel so agreed.

Good cause exists for these extensions to allow ViSalus' counsel to address the numerous issues raised in Plaintiff's voluminous motions. These extensions will not impact other existing deadlines and are not sought for purposes of delay.

Respectfully submitted,

Dated: October 5, 2020

MANATT, PHELPS & PHILLIPS, LLP

By s/Benjamin G. Shatz

---

Christine M. Reilly (pro hac vice)

creilly@manatt.com

Benjamin G. Shatz (pro hac vice)

bshatz@manatt.com

John W. McGuinness (pro hac vice)

jmcguinness@manatt.com

MANATT, PHELPS & PHILLIPS, LLP

2049 Century Park East, Suite 1700

Los Angeles, CA 90067

Tel: 310.312.4000 Fax: 310.312.4224

MILLER NASH GRAHAM & DUNN LLP

Joshua M. Sasaki, P.C., OSB No. 964182

josh.sasaki@millernash.com

Nicholas H. Pyle, OSB No. 165175

nicholas.pyle@millernash.com

Tel: 503.224.5858 Fax: 503.224.0155

Attorneys for Defendant ViSalus, Inc.